

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SARA TAYLOR, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

KIN INSURANCE, INC.,

Defendant.

Case No. 1:25-cv-00213

Judge: Hon. April M. Perry

Hon. M. David Weisman

**UNOPPOSED MOTION FOR AN ORDER DIRECTING PRODUCTION OF RECORDS  
IN RESPONSE TO DEFENDANT’S THIRD PARTY SUBPOENA PURSUANT TO THE  
FEDERAL COMMUNICATIONS ACT**

Defendant Kin Insurance, Inc. (“Defendant”) hereby respectfully submits this unopposed motion for an order directing non-party Charter Communications, Inc. (“Charter”) to produce records and information in response to a Rule 45 third-party subpoena dated July 2, 2025 (the “Subpoena”) issued by Defendant to Charter in the above-captioned matter. In support thereof, Defendant states as follows:

1. Plaintiff commenced this action on January 8, 2025. *See* Dkt. 1.
2. The parties held a joint Rule 26(f) conference on June 27, 2025, which provided for the commencement of discovery. *See* Dkt. 23.
3. On July 3, 2025, Defendant issued the Subpoena to Charter, which seeks records relating to the identity of the internet subscriber or account holder for a certain IP address. A copy of the email serving the Subpoena is attached hereto as **Exhibit A**.
4. On July 18, 2025, Charter responded to the Subpoena, indicating that Charter would

not produce responsive records absent a court order directing said production pursuant to the Federal Communications Act (specifically 47 U.S.C. § 551(c)(2)(B)), to the extent that the Subpoena potentially seeks disclosure of Personally Identifiable Information (“PII”) of Charter subscribers, and at that time provided Defendant with a form proposed order directing said production.

5. A copy of Charter’s July 18, 2025 responsive letter as to the Subpoena is attached hereto as **Exhibit B**. A revised copy of the proposed order provided by Charter, adapted for use in this case, will also be submitted concurrently for the Court’s consideration. A copy of this Motion will be served upon Charter, at the email addresses provided in Exhibits A and B attached hereto ([leroc@charter.com](mailto:leroc@charter.com) and [ShaRayne.Jackson@charter.com](mailto:ShaRayne.Jackson@charter.com)), contemporaneously upon its filing.

6. On August 7, 2025, counsel for Defendant and Plaintiff met and conferred regarding entry of the attached proposed order and the relief sought by the instant Motion. At that time, counsel for Plaintiff (Anthony Paronich) indicated in writing that Plaintiff did not oppose the relief sought in this Motion.

7. This Motion is made in good faith and not for the purposes of delay. Defendant respectfully submits that granting this Motion will aid in the ultimate determination of this case, and would not delay this case or prejudice any party if granted.

8. Therefore, Defendant respectfully submits that there is good cause for granting this Motion for at least the reasons above.

WHEREFORE, for all of these reasons, Defendant respectfully requests that the Court grant this Motion and enter the proposed order submitted concurrently herewith, or a substantially similar order, along with granting all other just and proper relief.

Dated: August 7, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa

A. Paul Heeringa (IL ARDC #6288233)  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I certify that, on August 7, 2025, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic docket.

I further certify that, on July 3, 2025, the Subpoena referenced in this Motion was served upon Charter, as is reflected in Exhibit A attached hereto.

I further certify that, on August 7, 2025, a copy of this Motion was served upon Charter, at the email addresses provided in Exhibit A & B attached hereto ([leroc@charter.com](mailto:leroc@charter.com) and [ShaRayne.Jackson@charter.com](mailto:ShaRayne.Jackson@charter.com)).

/s/ A. Paul Heeringa